

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

SHARON LYNN ROSS,)
Plaintiff,)
v.)
EXPERIAN INFORMATION SOLUTIONS,)
INC.,)
&)
WORLD FINANCIAL NETWORK)
NATIONAL BANK,)
&)
NELSON, WATSON & ASSOCIATES, LLC,)
Defendants.)
)
)
)
)
)

Civil Action No.: 3:12-cv-00286-REP

**DEFENDANT WORLD FINANCIAL NETWORK NATIONAL BANK'S MOTION TO
CONDUCT PRETRIAL SCHEDULING CONFERENCE AND AMEND SCHEDULING
AND PRETRIAL ORDER**

Defendant Comenity Bank, formerly known as World Financial Network Bank, successor by conversion to World Financial Network National Bank ("WFNNB"), by counsel, and pursuant to Fed. R. Civ. P. 16, moves this Court to suspend the current Scheduling and Pretrial Order, continue the February 4, 2013 trial date, and re-convene a Rule 16 Pretrial Conference in order to set a new trial date and Scheduling and Pretrial Order for this action for the reasons explained more fully in WFNNB's Memorandum in Support of this Motion, filed herewith.

Respectfully submitted,

/s/ Eileen Geller

John B. Mumford, Jr. (VSB No. 38764)
Eileen R. Geller (VSB No. 76764)
HANCOCK, DANIEL, JOHNSON & NAGLE, P.C.
4701 Cox Road, Suite 400
Glen Allen, Virginia 23060
Phone: (804) 967-9604
Fax: (804) 967-2411
jmumford@hdjn.com and egeller@hdjn.com
Counsel for World Financial Network National Bank

CERTIFICATE OF SERVICE

I hereby certify that on November 26, 2012, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Leonard Anthony Bennett (Va. Bar No. 37523)

Susan Mary Rotkis
CONSUMER LITIGATION ASSOCIATES
763 J Clyde Morris Boulevard
Suite 1A
Newport News, VA 23601
757-930-3660
757-930-3662 (fax)
lenbennett@cox.net
Counsel for Plaintiff

David Neal Anthony (Va. Bar No. 31696)

TROUTMAN SANDERS LLP
Troutman Sanders Bldg
1001 Haxall Point
PO Box 1122
Richmond, VA 23219
804-697-5410
804-698-5118 (fax)
david.anthony@troutmansanders.com
*Counsel for Defendant Experian
Information Solutions, Inc.*

Andrew Biondi (Va. Bar No. 48100)

SANDS ANDERSON PC
1111 E. Main St., Suite 2400
Richmond, VA 23219
804-648-1636
804-783-7291 (fax)
abiondi@sandsanderson.com
Counsel for Defendant Nelson, Watson & Associates, LLC

/s/ Eileen Geller

John B. Mumford, Jr. (VSB No. 38764)
Eileen R. Geller (VSB No. 76764)
HANCOCK, DANIEL, JOHNSON & NAGLE, P.C.
4701 Cox Road, Suite 400
Glen Allen, Virginia 23060
Phone: (804) 967-9604
Fax: (804) 967-2411
jmumford@hdjn.com
egeller@hdjn.com
Counsel for World Financial Network National Bank